

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Case No.: 20-10322-CLB

Chapter: 11

Debtor.

NOTICE OF FILING

PLEASE TAKE NOTICE that, in accordance with the Order entered July 9, 2020 [Docket No. 442] *Nunc Pro Tunc* to February 28, 2020, Connors LLP has filed the Monthly Fee Statement of Connors LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Counsel to The Diocese of Buffalo, N.Y., for the Period September 1, 2022 – September 30, 2022, a copy of which is attached hereto and hereby served upon you.

DATED: Buffalo, New York
 October 25, 2022

s/ Randall D. White
Randall D. White, Esq.
CONNORS LLP
Special Counsel for Debtor
The Diocese of Buffalo, N.Y.
1000 Liberty Building
Buffalo, New York 14202
(716) 852-5533

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Case No.: 20-10322-CLB

Chapter: 11

Debtor.

MONTHLY FEE STATEMENT OF CONNORS LLP
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
THE DIOCESE OF BUFFALO, N.Y.
FOR THE PERIOD SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022

Name of Applicant:	Connors LLP
Authorized to Provide Professional Services to:	The Diocese of Buffalo, N.Y., Debtor-in-Possession
Date of Retention:	Order entered July 9, 2020 [Docket No. 442] <i>Nunc Pro Tunc</i> to February 28, 2020
Period for which compensation and reimbursement is sought:	September 1, 2022 – September 30, 2022
Amount of compensation sought as actual, reasonable, and necessary:	80% of \$53,115.00 (\$42,492.00)
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$632.19

This is a: X monthly quarterly final application.

This is the monthly fee statement of Connors LLP in this case.

CONNORS LLP
 1000 Liberty Building
 Buffalo, NY 14202
 TAX ID NO. 16-1282035

October 24, 2022

DIOCESE OF BUFFALO
 795 Main Street
 Buffalo, NY 14203

Invoice# 38181 RDW
 Our file# 002700 00006
 Billing through 09/30/2022

MISCELLANEOUS MATTERS

PROFESSIONAL SERVICES

09/01/2022	LFQ	(Misc) Assist with response to several different media inquiries by checking files for facts and communicating with Chancery representatives.	1.90 hrs.	250 /hr	475.00
09/01/2022	RDW	(Misc) Emails regarding response to media inquiries regarding multiple matters.	0.60 hrs.	250 /hr	150.00
09/01/2022	TMC	(Misc) Receipt of inquiry from Diocese regarding health records and possible privilege issues (.4); receipt of inquiries from several media sources regarding prior claims against priest and the response of the Diocese (.6); confer with Lawlor F. Quinlan III after review of records (.2).	1.20 hrs.	250 /hr	300.00
09/02/2022	LFQ	(Misc) Help with response to media inquiries by reviewing questions and communicating with Chancery representatives.	1.00 hrs.	250 /hr	250.00
09/02/2022	RDW	(Misc) Review of file and emails and conferences regarding response to media inquiry.	1.20 hrs.	250 /hr	300.00
09/05/2022	TMC	(Misc) Confer with Director of Communications Martone regarding media inquiry about priest (.4); reviewing documents and research for additional information (.3).	0.70 hrs.	250 /hr	175.00
09/06/2022	LFQ	(Independent Review Board) Communications with Independent Review Board	1.30 hrs.	250 /hr	325.00

		Chair regarding inaccuracies in media story and possible response (.8); prepare package of materials for Independent Review Board regarding recently reported matter (.5).			
09/06/2022	LFQ	(Misc) Work on response to other media inquiry.	0.80 hrs.	250 /hr	200.00
09/06/2022	TMC	(Misc) Conversation with Lawlor F. Quinlan III regarding response to media inquiry.	0.30 hrs.	250 /hr	75.00
09/07/2022	LFQ	(Independent Review Board) Telephone conference with investigator regarding status of investigation (.3); telephone conference with Independent Review Board Chair regarding next meeting (.3); work on document requested by Independent Review Board Chairman (3.5); prepare for and participate in call with Chancery representatives and communications regarding response to story in media about the Diocese (.9); communications with attorney for priest (.2).	5.20 hrs.	250 /hr	1,300.00
09/08/2022	LFQ	(Independent Review Board) Assist with response to media regarding various stories (.8); work on document requested by Independent Review Board Chair (1.5); communications with Independent Review Board Chair regarding various matters (.7); communication with claimant's attorney (.3); communications with attorney for priest (.3); communication with investigator (.2).	3.80 hrs.	250 /hr	950.00
09/09/2022	TMC	(Misc) Receiving renewed inquiry from reporters regarding homicide cold case (.3); conferring with Director of Communications Martone (.3); research and email	1.10 hrs.	250 /hr	275.00

		correspondence with the Diocese regarding above (.5).			
09/09/2022	LFQ	(Independent Review Board) Communications with Independent Review Board Chair regarding several matters and upcoming meeting (.4); communication with Chancery and Independent Review Board member regarding next meeting (.5); communications with attorney for claimant (.1).	1.00 hrs.	250 /hr	250.00
09/09/2022	RDW	(Misc) Review of file and internal communications regarding response to media inquiry.	1.30 hrs.	250 /hr	325.00
09/12/2022	LFQ	(Independent Review Board) Communications with Independent Board Chairman regarding next meeting (.4); communications with Chancery representative regarding same (.5); communications with investigators regarding same (.5); communications with attorneys for priest regarding same (.7).	2.10 hrs.	250 /hr	525.00
09/13/2022	LFQ	(Independent Review Board) Communications with Independent Review Board Chair regarding matters to be addressed at Independent Review Board meeting later this month (.4); follow up on instructions from Independent Review Board Chair (.7); communications with attorney for claimant regarding claimant's ability to appear at Independent Review Board meeting (.2); communications with investigator regarding status of investigation (.3).	1.60 hrs.	250 /hr	400.00
09/13/2022	TMC	(Misc) Reviewing the information that has been recently published regarding matter pursuant to our policies;	0.50 hrs.	250 /hr	125.00

		conference with Randall D. White and Lawlor F. Quinlan III regarding same.			
09/14/2022	LFQ	(Independent Review Board) Communications with Victim Assistance Coordinator regarding call from survivor and improving policies (.4); communications with investigators regarding obtaining requested information so that investigator can contact attorney for survivor and other witnesses (.5); communications with Independent Review Board Chair regarding next meeting (.6).	1.50 hrs.	250 /hr	375.00
09/14/2022	LFQ	(Misc) Emails with diocesan communications representatives regarding media inquiry.	0.40 hrs.	250 /hr	100.00
09/14/2022	RDW	(Misc) Conference with Terrence M. Connors and Lawlor F. Quinlan III regarding response to media inquiry.	0.20 hrs.	250 /hr	50.00
09/15/2022	LFQ	(Independent Review Board) Review certain file at Chancery at request of Independent Review Board Chair to provide information to Independent Review Board (2.4); telephone conference from survivor who wants to assist Diocese with various issues (.5).	2.90 hrs.	250 /hr	725.00
09/19/2022	LFQ	(Independent Review Board) Communications with Independent Review Board Chair regarding next week's meeting; communications with attorney for claimant regarding participation in Independent Review Board meeting.	0.40 hrs.	250 /hr	100.00
09/20/2022	LFQ	(Independent Review Board) Communications with Independent Review Board Chair regarding next Independent Review Board meeting; arrange for documents	0.40 hrs.	250 /hr	100.00

DIOCESE OF BUFFALO

Invoice# 38181

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		to be shared with the entire Independent Review Board.			
09/20/2022	RMV	(Independent Review Board) Prepare for upcoming Review Board meeting by working on agenda, drafting memos, and preparing individual files.	1.30 hrs.	100 /hr	130.00
09/21/2022	LFQ	(Independent Review Board) Work on documents for next week's Independent Review Board meeting (.8); communications with attorney for priest (.2); communications with Independent Review Board Chair regarding next week's meeting (.1).	1.10 hrs.	250 /hr	275.00
09/22/2022	LFQ	(Independent Review Board) Communications with Independent Review Board Chair regarding next week's meeting (.8); communication with investigator to ensure completion of report to Independent Review Board in time for meeting (.2); communication with Chancery representative regarding Independent Review Board meeting logistics (.2); communication with attorney for claimant regarding same (.2).	1.40 hrs.	250 /hr	350.00
09/22/2022	RMV	(Independent Review Board) Locate, review, and organize numerous reports as requested by Lawlor F. Quinlan III.	2.10 hrs.	100 /hr	210.00
09/22/2022	RMV	(Misc) Prepare for completing upcoming CARA survey.	0.90 hrs.	100 /hr	90.00
09/23/2022	LFQ	(Independent Review Board) Communications with attorney for claimant regarding claimant's appearance at next week's Independent Review Board meeting (.2); work on ensuring that all relevant documents have been sent to Independent Review Board members and communications regarding same	0.70 hrs.	250 /hr	175.00

(.5).

09/23/2022	RMV	(Independent Review Board) Review and organize new reports provided by Lawlor F. Quinlan III.	1.60 hrs.	100 /hr	160.00
09/26/2022	LFQ	(Independent Review Board) Prepare for Independent Review Board meeting tomorrow (1.6); communications with Independent Review Board Chairman regarding same (.3).	1.90 hrs.	250 /hr	475.00
09/27/2022	LFQ	(Independent Review Board) Prepare for and participate in Independent Review Board meeting.	5.30 hrs.	250 /hr	1,325.00
09/28/2022	LFQ	(Independent Review Board) Several communications with Independent Review Board Chair regarding yesterday's meeting and his instructions regarding same (.6); prepare documents in accordance with Independent Review Board Chair's instructions (.9).	1.50 hrs.	250 /hr	375.00
09/28/2022	TMC	(Misc) Email correspondence with priest regarding a threatening scare, filing police report, and seeking protective order (.3); email correspondence with Director of Insurance Services John Scholl regarding above (.3).	0.60 hrs.	250 /hr	150.00
09/28/2022	RMV	(Independent Review Board) Review status of several claims as requested by Lawlor F. Quinlan III.	1.40 hrs.	100 /hr	140.00
09/29/2022	LFQ	(Independent Review Board) Work on documents at direction of Independent Review Board Chair implementing recommendations of Independent Review Board (1.4); communications with Independent Review Board Chair and Independent Review Board Acting Secretary	2.80 hrs.	250 /hr	700.00

			regarding same (.6); work on document regarding concern recently raised about priest (.4); communications with Chancery representative regarding same (.2); review documents sent by Independent Review Board member (.2).		
09/29/2022	TMC	(Misc)	Responding to inquiry from Diocese regarding disclosure of personnel and medical file issues.	0.40 hrs.	250 /hr 100.00
09/29/2022	CME	(Misc)	Review of emails and confer with Terrence M. Connors regarding disclosure inquiry (.3); review statutes, guidance, and regulations regarding possible disclosure of file (1.4).	1.70 hrs.	200 /hr 340.00
09/30/2022	LFQ	(Misc)	Work on answering questions posed by Chancery representatives regarding facts about several hundred claims filed against Diocese (.9); communications with Independent Review Board Chair (.2).	1.10 hrs.	250 /hr 275.00
09/30/2022	TMC	(Misc)	Confer with Director of Communications Martone regarding response to media inquiries with respect to homicide cold case (.4); preparation of research memorandum regarding discovery of file for review by COO Suchan (.7).	1.10 hrs.	250 /hr 275.00
09/30/2022	CME	(Misc)	Draft memorandum regarding possible disclosure of file (.9); confer with Terrence M. Connors regarding above (.1).	1.00 hrs.	200 /hr 200.00
Total fees for this matter					\$13,595.00
<u>DISBURSEMENTS</u>					
09/30/2022	COMPUTER RESEARCH - WESTLAW				42.12
Total disbursements for this matter					\$42.12

BILLING SUMMARY

DIOCESE OF BUFFALO		Invoice#	38181	Page 8
Connors, Terrence M.	Partner	5.90 hrs	250 /hr	1,475.00
White, Randall D.	Partner	3.30 hrs	250 /hr	825.00
Quinlan, Lawlor F. III	Partner	40.10 hrs	250 /hr	10,025.00
Eaton, Christina M.	Associate	2.70 hrs	200 /hr	540.00
Valkwitch, Rachel M.	Legal Assistant	7.30 hrs	100 /hr	730.00
TOTAL FEES		59.30 hrs		\$13,595.00
TOTAL DISBURSEMENTS				\$42.12
TOTAL CHARGES FOR THIS BILL				\$13,637.12

CONNORS LLP
 1000 Liberty Building
 Buffalo, NY 14202
 TAX ID NO. 16-1282035

October 24, 2022

DIOCESE OF BUFFALO
 795 Main Street
 Buffalo, NY 14203

Invoice# 38182 RDW
 Our file# 002700 00040
 Billing through 09/30/2022

NYSAG SUBPOENA

PROFESSIONAL SERVICES

09/01/2022	LFQ	Reorganizing policies to correspond to OAG agreement (.8); communications with Victim Assistance Coordinator regarding proposed changes to policies (.3).	1.10 hrs.	250 /hr	275.00
09/06/2022	TMC	Reviewing media article with respect to prior claims against priests (.3); confer with our team to determine what impact, if any, on settlement negotiations and our response to Office of Attorney General inquiries (.4).	0.70 hrs.	250 /hr	175.00
09/08/2022	LFQ	Review letter from Attorney General's Office (.4); work on obtaining answers to several questions posed by Attorney General's Office (.7); communications with Jones Day attorneys regarding same (.4).	1.50 hrs.	250 /hr	375.00
09/08/2022	TMC	Preparation for and participation in conference call with the attorneys for other Dioceses in the State of New York in order to discuss the status of our negotiations with the Office of Attorney General.	0.70 hrs.	250 /hr	175.00
09/09/2022	LFQ	Prepare for and participate in conference call with client and Jones Day attorneys (.6); work on answering questions posed by Office of Attorney General (2.1).	2.70 hrs.	250 /hr	675.00
09/09/2022	RMV	Conduct file research to provide	3.40 hrs.	100 /hr	340.00

		answer to question posed by Attorney General's office (1.4); organize various supporting documents (.6); create chart and memo to provide to Lawlor F. Quinlan III to assist in answering Attorney General question (1.4).			
09/10/2022	LFQ	Work on response to Office of Attorney General's request for information.	0.80 hrs.	250 /hr	200.00
09/12/2022	LFQ	Work on revising charts to accurately convey information requested by Office of Attorney General (2.7); several communications with Jones Day attorneys regarding response to Office of Attorney General (.8).	3.50 hrs.	250 /hr	875.00
09/13/2022	LFQ	Revise chart pursuant to suggestions of Jones Day attorneys (.7); work on obtaining information necessary to respond to Office of Attorney General (.5); work on drafts of document addressing concerns of Office of Attorney General (2.6); communications with Jones Day attorneys regarding same (.8).	4.60 hrs.	250 /hr	1,150.00
09/14/2022	LFQ	Obtain information requested by Jones Day attorneys and incorporate into chart (1.0); communication with Chancery representative regarding several issues related to Office of Attorney General matter (.4); several communications with Jones Day attorneys regarding response to Office of Attorney General (.7).	2.10 hrs.	250 /hr	525.00
09/14/2022	TMC	Confer with Randall D. White about certain matters pertaining to the office of Office of Attorney General's settlement (.3); reviewing the motion papers from other case regarding discovery issues (.3).	0.60 hrs.	250 /hr	150.00
09/15/2022	LFQ	Work on response to Office of Attorney General's request for	1.10 hrs.	250 /hr	275.00

		information (.7); communications with Jones Day attorneys regarding same (.4).			
09/15/2022	TMC	Preparation for and participation in conference call with the attorneys for other Dioceses in the State of New York about the status of the litigation with the Office of Attorney General (.7); preparation of memorandum (.1); receipt and review of our proposed response to the Office of Attorney General on certain terms and conditions in the settlement agreement that remain unresolved (.6).	1.40 hrs.	250 /hr	350.00
09/16/2022	TMC	Review of letter from the Office of Attorney General regarding issues as to final settlement agreement and brief conference with Lawlor F. Quinlan III.	0.30 hrs.	250 /hr	75.00
09/20/2022	TMC	Receipt and review of the latest version of the stipulated order, together with letter to the Office of Attorney General regarding policies and procedures.	0.60 hrs.	250 /hr	150.00
09/22/2022	LFQ	Prepare for and participate in conference with Office of Attorney General attorneys.	0.70 hrs.	250 /hr	175.00
09/22/2022	TMC	Preparation for and participation in conference call with attorneys for other Dioceses in the State of New York about the status of the litigation with the Office of Attorney General (.5); preparation of memorandum (.1).	0.60 hrs.	250 /hr	150.00
09/26/2022	LFQ	Work on response to request for information made by Office of Attorney General (2.4); communication with Jones Day attorneys regarding same (.5).	2.90 hrs.	250 /hr	725.00
09/27/2022	LFQ	Review documents from Jones Day attorneys to be submitted to Office of Attorney General (.5); communications with Jones Day attorneys regarding same (.4);	1.10 hrs.	250 /hr	275.00

DIOCESE OF BUFFALO

Invoice# 38182

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		communications with client regarding same (.2).			
09/27/2022	TMC	Reviewing our response to questions from the Office of Attorney General and receiving and reviewing their letter response.	0.60 hrs.	250 /hr	150.00
09/28/2022	LFQ	Communications with Jones Day attorney and client regarding process of Court approval of settlement.	0.50 hrs.	250 /hr	125.00
09/29/2022	RMV	Research claims and abuse dates as requested by Lawlor F. Quinlan III.	1.90 hrs.	100 /hr	190.00
09/29/2022	LFQ	Prepare for and participate in conference call with other NYS diocesan counsel regarding litigation (.8); prepare for and participate in video conference with team and client (.9); work on documents to prepare Chancery representative for questions from media (.8).	2.50 hrs.	250 /hr	625.00
09/29/2022	TMC	Preparation for and participation in a call with attorneys for other Dioceses in the State of New York about status of the Office of Attorney General litigation (.7); preparation of memorandum (.1).	0.80 hrs.	250 /hr	200.00
09/30/2022	RMV	Further revised research on claims and abuse dates as requested by Lawlor F. Quinlan III.	2.60 hrs.	100 /hr	260.00
		Total fees for this matter			\$8,640.00

BILLING SUMMARY

Connors, Terrence M.	Partner	6.30 hrs	250 /hr	1,575.00
Quinlan, Lawlor F. III	Partner	25.10 hrs	250 /hr	6,275.00
Valkwitch, Rachel M.	Legal Assistant	7.90 hrs	100 /hr	790.00
TOTAL FEES		39.30 hrs		\$8,640.00
TOTAL CHARGES FOR THIS BILL				\$8,640.00

CONNORS LLP
 1000 Liberty Building
 Buffalo, NY 14202
 TAX ID NO. 16-1282035

October 24, 2022

DIOCESE OF BUFFALO
 795 Main Street
 Buffalo, NY 14203

Invoice# 38183 RDW
 Our file# 002700 00046
 Billing through 09/30/2022

CHILD VICTIMS ACT

PROFESSIONAL SERVICES

09/01/2022	RDW	Preparation for and review documents at Diocese (3.3); review of documents and preparation of privilege logs (3.4); emails to BSK forwarding documents and privilege logs for production (.6).	7.30 hrs.	250 /hr	1,825.00
09/01/2022	KER	Draft/review privilege log.	0.50 hrs.	200 /hr	100.00
09/01/2022	RMV	Finalize changes to the privilege log for documents contained in production (1.1); preparation of additional production (1.3); finalize privilege log for that production (.7); prepare and complete third production (1.0); complete the privilege log for third production (.5); modify privilege log for prior production (.6).	5.20 hrs.	100 /hr	520.00
09/02/2022	RDW	Preparation for and document review at Diocese (3.5); email to Diocese regarding above (.7); email to BSK forwarding documents and privilege log for production (.8).	5.00 hrs.	250 /hr	1,250.00
09/02/2022	KER	Draft/review health-related privilege log.	0.30 hrs.	200 /hr	60.00
09/02/2022	RMV	Finalize two productions and privilege logs.	2.10 hrs.	100 /hr	210.00
09/03/2022	KER	Review/analyze productions and privilege logs produced for consistency and to determine next files for review.	0.40 hrs.	200 /hr	80.00

09/06/2022	RDW	Review of file and email response to Diocese inquiry regarding mediation (.4); review of documents regarding responses to discovery inquiries and possible supplemental document production (4.7); email to paralegal, Rachel M. Valkwitch regarding above (.3).	5.40 hrs.	250 /hr	1,350.00
09/07/2022	RDW	Work on responses to discovery inquiries (5.1); telephone conference with CVA co-defense counsel regarding defense issues and strategy (1.0).	6.10 hrs.	250 /hr	1,525.00
09/07/2022	RMV	Perform search for specific documents in produced file per Randall D. White request.	0.70 hrs.	100 /hr	70.00
09/08/2022	RDW	Participate in weekly NYS diocesan counsel call (.2); review of documents regarding responses to discovery inquiries and supplemental document production (3.0); review of recent filings and notices in BSA bankruptcy (.5).	3.70 hrs.	250 /hr	925.00
09/08/2022	KER	Meet/confer with Randall D. White regarding upcoming privilege review.	0.10 hrs.	200 /hr	20.00
09/08/2022	RMV	Conduct searches of produced files per Randall D. White request.	0.90 hrs.	100 /hr	90.00
09/09/2022	RDW	Work on possible supplemental document production (.5); conference with associate, Kelly E. Riley regarding privilege issues regarding above (.5); further work on other discovery inquiries (.7).	1.70 hrs.	250 /hr	425.00
09/09/2022	KER	Continue privilege review of priest personnel file documents.	0.60 hrs.	200 /hr	120.00
09/10/2022	LFQ	Work on response to document demand from insurance carriers.	0.40 hrs.	250 /hr	100.00
09/10/2022	RDW	Review of documents regarding privilege and possible production (2.0); preparation for and	3.40 hrs.	250 /hr	850.00

conference with Lawlor F. Quinlan III regarding above and discovery issues (.7); preparation for and conference with associate, Kelly E. Riley regarding privilege issues and privilege log (.7).					
09/10/2022	KER	Continue privilege review of priest personnel file documents (.9); prepare for and meet with Randall D. White regarding potentially privileged documents (.5); finalize production accordingly (1.1).	2.50 hrs.	200 /hr	500.00
09/12/2022	RDW	Review of documents regarding possible supplemental production (4.9); conferences with paralegal, Rachel M. Valkwitch regarding above (.4); preparation of memorandum regarding document review (.7).	6.00 hrs.	250 /hr	1,500.00
09/12/2022	RMV	Prepare further document production (.8); create draft privilege log for that production (2.7); prepare additional production (.6).	4.10 hrs.	100 /hr	410.00
09/13/2022	RDW	Review of documents regarding privilege, confidentiality issues, and possible production (2.8); work on response to discovery inquiries (2.7); conferences with associate, Kelly E. Riley and paralegal, Rachel M. Valkwitch regarding production of documents and privilege logs (.7); preparation of memoranda regarding document review and responses to discovery inquiries (.6).	6.80 hrs.	250 /hr	1,700.00
09/13/2022	RMV	Complete preparation of production and prepare production transmittal (.6); compile documents that contained privilege redactions for associate, Kelly E. Riley to review (.3).	0.90 hrs.	100 /hr	90.00
09/14/2022	RDW	Work on responses to discovery	4.90 hrs.	250 /hr	1,225.00

		inquiries, including document review (3.5); review of filings in other CVA case regarding relevant discovery disputes and privilege issues (1.4).			
09/14/2022	TMC	Reviewing the most recent filings on docket sheets; brief conference with Randall D. White.	0.30 hrs.	250 /hr	75.00
09/15/2022	RDW	Preparation for and participate in NYS diocesan counsel call regarding CVA litigation (.3); preparation for and conference and review of documents at Diocese (3.7); preparation of memoranda regarding document review (.4); further work on responses to discovery inquiries (1.7).	6.10 hrs.	250 /hr	1,525.00
09/15/2022	KER	Draft/revise privilege log.	0.70 hrs.	200 /hr	140.00
09/15/2022	RMV	Finalize privilege log for production.	0.80 hrs.	100 /hr	80.00
09/16/2022	RDW	Preparation of and forward documents and privilege log to BSK for production (1.3); review of additional documents for privilege and possible production (.8); conferences with associate, Kelly E. Riley and paralegal, Rachel M. Valkwitch regarding above (.4); preparation of memoranda regarding documents and review (.7).	3.20 hrs.	250 /hr	800.00
09/16/2022	RMV	Prepare production and draft transmittal.	0.40 hrs.	100 /hr	40.00
09/19/2022	RDW	Review of documents regarding privilege and possible production (2.1); preparation of memoranda regarding document review and production (.7); email regarding adult abuse victims act (.5); email to Diocese regarding documents (.2).	3.50 hrs.	250 /hr	875.00
09/19/2022	TMC	Reviewing the Adult Survivor legislation and brief conference with Randall D. White and	0.30 hrs.	250 /hr	75.00

		Lawlor F. Quinlan III in anticipation of Adult Survivor claims.			
09/19/2022	RMV	Consult with eDiscovery Project Manager from BSK regarding BSK questions on production (.3); review said production (.6); advise BSK of findings (.2).	1.10 hrs.	100 /hr	110.00
09/20/2022	RDW	Research and respond to Blank Rome insurance inquiry (1.2); review of documents regarding response to discovery inquiry (2.2); preparation for and conference regarding response to discovery inquiries, and document review and privilege issues (.8); preparation for conference with Lawlor F. Quinlan III regarding discovery inquiry (.4).	4.60 hrs.	250 /hr	1,150.00
09/20/2022	RMV	Review new set of supplemental priest personnel file documents (1.0); preparation of documents for further review and production (1.3).	2.30 hrs.	100 /hr	230.00
09/21/2022	RDW	Preparation for and meet with associate, Kelly E. Riley regarding documents and privilege and production issues (1.4); follow-up email (.2); work on follow-up items (.7); review of additional documents regarding possible production (2.0); preparation of memoranda regarding document review (.5).	4.80 hrs.	250 /hr	1,200.00
09/21/2022	KER	Meet/confer with Randall D. White regarding potentially privileged documents.	1.30 hrs.	200 /hr	260.00
09/22/2022	LFQ	Work on document production regarding request made by insurance carriers.	3.30 hrs.	250 /hr	825.00
09/22/2022	RDW	Preparation for and conference with Lawlor F. Quinlan III regarding response to discovery inquiry.	0.80 hrs.	250 /hr	200.00
09/22/2022	KER	Continue privilege review of	0.20 hrs.	200 /hr	40.00

		priest personnel file documents.			
09/23/2022	LFQ	Work on document production in response to request by insurance carriers.	2.10 hrs.	250 /hr	525.00
09/24/2022	RDW	Work on responses to discovery inquiries (2.0); preparation of memorandum regarding above (.6).	2.60 hrs.	250 /hr	650.00
09/25/2022	LFQ	Work on document production and response to request from insurance carriers.	2.40 hrs.	250 /hr	600.00
09/26/2022	LFQ	Work on document production and response to request from insurance carriers.	5.40 hrs.	250 /hr	1,350.00
09/26/2022	RDW	Work on responses to discovery inquiries (3.6); preparation for and conferences with associate, Kelly E. Riley regarding privilege issues and document production (.7); preparation of memoranda regarding document review (.8).	5.10 hrs.	250 /hr	1,275.00
09/26/2022	KER	Continue privilege review of priest personnel file documents (1.9); prepare for and meet with Randall D. White regarding potentially privileged documents (.2); finalize production (.1).	2.20 hrs.	200 /hr	440.00
09/27/2022	RDW	Preparation for and emails and conference with paralegal, Rachel M. Valkwitch regarding response to discovery inquiry.	0.50 hrs.	250 /hr	125.00
09/27/2022	TMC	Conference call with plaintiffs' attorney regarding issues and status of this matter.	0.60 hrs.	250 /hr	150.00
09/27/2022	RMV	Perform search for specific documents contained in produced file per Randall D. White request (1.0); prepare document production (.9).	1.90 hrs.	100 /hr	190.00
09/28/2022	LFQ	Work on production of documents in response to request from insurance carriers.	2.40 hrs.	250 /hr	600.00
09/28/2022	RDW	Preparation for and conference	1.10 hrs.	250 /hr	275.00

with Lawlor F. Quinlan III and paralegal, Rachel M. Valkwitch regarding response to discovery inquiry (.7); preparation of memoranda regarding document review (.4).

09/28/2022	RMV	Preparation of document production (.6); create privilege log detailing privileged documents contained in production (2.3); complete search within previous production per Randall D. White request (.8).	3.70 hrs.	100 /hr	370.00
09/29/2022	LFQ	Work on document production in response to requests from insurance carriers.	1.20 hrs.	250 /hr	300.00
09/29/2022	RDW	Work on responses to discovery inquiries (2.7); preparation of memoranda regarding above (.4).	2.20 hrs.	250 /hr	550.00
09/29/2022	RMV	Prepare next non-priest personnel file production by applying redactions to several documents per Lawlor F. Quinlan III request.	2.70 hrs.	100 /hr	270.00
09/30/2022	RDW	Work on responses to discovery inquiries (.9); conferences with paralegal, Rachel M. Valkwitch regarding above and production and privilege issues (.5).	1.40 hrs.	250 /hr	350.00
09/30/2022	RMV	Complete applying redactions to new non-priest personnel file production (1.9); create redaction log (1.0).	2.90 hrs.	100 /hr	290.00
Total fees for this matter					<u>\$30,880.00</u>
<u>DISBURSEMENTS</u>					
09/15/2022	OUTSIDE REPRODUCTION OF DOCUMENTS				376.28
09/15/2022	OUTSIDE REPRODUCTION OF DOCUMENTS				73.13
09/15/2022	OUTSIDE REPRODUCTION OF DOCUMENTS				111.47
09/30/2022	COMPUTER RESEARCH - WESTLAW				22.99
09/30/2022	PHOTOCOPIES				6.20
Total disbursements for this matter					<u>\$590.07</u>

BILLING SUMMARY

Connors, Terrence M.	Partner	1.20 hrs	250 /hr	300.00
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DIOCESE OF BUFFALO		Invoice#	38183	Page 8
White, Randall D.	Partner	86.20 hrs	250 /hr	21,550.00
Quinlan, Lawlor F. III	Partner	17.20 hrs	250 /hr	4,300.00
Riley, Kelly E	Associate	8.80 hrs	200 /hr	1,760.00
Valkwitch, Rachel M.	Legal Assistant	29.70 hrs	100 /hr	2,970.00
TOTAL FEES		143.10 hrs		\$30,880.00
TOTAL DISBURSEMENTS				\$590.07
TOTAL CHARGES FOR THIS BILL				\$31,470.07